

USDC SDNY
DOCUMENT
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DATE FILED: 6/5/2020

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON JUDICIAL CIVIL FORFEITURE :
PROCEEDING REGARDING \$15,876.00 IN :
UNITED STATES CURRENCY SEIZED ON OR :
ABOUT DECEMBER 11, 2019. :
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STIPULATION AND ORDER

20 Misc. 214-P1

WHEREAS, on or about December 11, 2019, the Drug Enforcement Administration (the "DEA") seized \$15,876.00 in United States currency (the "Seized Property"), and the DEA initiated an administrative forfeiture proceeding against the Seized Property pursuant to Title 21, United States Code, Section 881 by timely sending written notice of its intent to forfeit the Seized Property to all known interested parties;

WHEREAS, on or about February 26, 2020, the DEA received a claim from Stephanie Ibonnet (the "Claimant"), asserting an interest in the Seized Property;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney's Office for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Seized Property;

WHEREAS, Title 18, United States Code, Section, 983(a)(3)(A) provides that, "[n]ot later than 90 days after a claim has been filed, the Government shall file a complaint for

forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties”;

WHEREAS, pursuant to Title 18, United States Code, Section, 983(a)(3), the United States is required to file a civil complaint to forfeit the Seized Property no later than May 26, 2020;

WHEREAS, the Claimant, through counsel, Michael P. Kushner, Esq., has consented to a 30-day extension of the deadline for the Government to file a complaint against the Seized Property;

WHEREAS, Michael P. Kushner, Esq., attorney for the Claimant, represents and warrants that he is authorized to execute this Stipulation on behalf of his client, Stephanie Ibonnet; and

WHEREAS, the Government requests an extension of 30 days to file a complaint from May 26, 2020 to June 25, 2020;

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NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the aforementioned parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the time in which the Government is required to file a complaint for forfeiture of the Seized Property is extended from May 26, 2020, up to and including June 25, 2020.

AGREED AND CONSENTED TO:

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By:



MICHAEL LONGYEAR
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
Tel.: 212-637-2233

May 22, 2020

DATE

By:

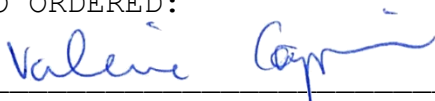


MICHAEL P. KUSHNER, ESQ.
Attorney for Stephanie Ibonnet
Kushner Law Group, P.L.L.C.
16 Court Street
36th Floor
Brooklyn, NY 11241

May 22, 2020

DATE

SO ORDERED:



HONORABLE VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

6/5/2020

DATE